

# EXHIBIT E

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13 Also Present:

14 Peggy Stephens

1 Q. Okay. Did Ms. Simpson have a  
2 manager in March of 2020?

3 A. Well, I think that was  
4 Donaciano Ponce de Leon. She was the generalist,  
5 he was the manager.

6 Q. In March of 2020?

7 A. I don't know.

8 Q. When did you first learn that Ms.  
9 Andrews had asthma?

10 A. I don't recall knowing Ms.  
11 Andrews having asthma as a problem.

12 Q. And do you recall Ms. Andrews  
13 having coughing as a problem?

14 A. No.

15 Q. And you worked in the Nashville  
16 office in 2020?

17 A. Yes.

18 Q. And that's the only office you  
19 worked in? That's the one you're main stationed  
20 at?

21 A. That's where my main station is,  
22 yes.

23 Q. And did you go to work -- in  
24 2020, were you going to work to the office every  
25 day?